

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

A.A., as parent/guardian of T.J., a minor child,

Plaintiff,

v.

Seattle Public School District,

Defendant.

Case No. 2:25-cv-1377

**PLAINTIFFS' COMPLAINT AND
PETITION FOR JUDICIAL
REVIEW AND FOR RECOVERY
OF ATTORNEY FEES AND COSTS
PURSUANT TO 20 U.S.C. § 1415**

Plaintiff brings this action for violations of T.J.'s rights under the Individuals with Disabilities Education Act (IDEA), 20 U.S.C. § 1415(i)(2), and its federal and state implementing regulations, 34 C.F.R. Part 300, WAC § 392-172A-05115.

I. PARTIES

1.1 Plaintiff A.A. is the parent and guardian of T.J., a minor student with disabilities who receives special education services.

1.2 To protect the privacy of the minor student at issue, only initials are used for the Plaintiff Parent and child. The true identities of Plaintiffs are known to the parties.

1.3 Plaintiffs reside and have resided at all times relevant to this action in Seattle, Washington within the District's boundary lines.

1.4 Defendant Seattle Public School District ("District") is a public school district located in the City of Seattle, County of King, in Washington State that is a corporate body with all the usual powers of a public corporation that may be sued pursuant to RCW 28A.320.010.

1.5 One source of federal funds received by the District are funds to educate students with disabilities pursuant to 20 USC § 1413 in compliance with the provisions of the IDEA and its implementing regulation, 34 CFR Part 300.

II. JURISDICTION AND VENUE

2.1 This Court has jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States pursuant to 28 U.S.C. § 1331, including any civil action to redress the deprivation of any right, privilege, or immunity secured by the Constitution, laws, or treaties caused under the color of state law, statute, ordinance, regulation, custom, or usage pursuant to 28 U.S.C. § 1343.

2.2 This Court has jurisdiction of the IDEA claims pursuant to 20 USC § 1415(i)(3), which provides an appeal of the ALJ Decision as a matter of right.

2.3 A civil action may be brought in a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred pursuant to 28 U.S.C. § 1391.

2.4 Venue is proper in this Court pursuant to 28 U.S.C. § 1391 because all the incidents described in this Complaint occurred in the Seattle, Washington.

III. FACTUAL ALLEGATIONS

3.1 The time period relevant to this action is set forth in the administrative law judge's Findings of Fact, Conclusions of Law, and Final Order dated April 23, 2025 ("ALJ Decision"), a copy of which is attached as Attachment A.

3.2 Among other errors, the ALJ Decision included findings and conclusions that were inconsistent with and erroneous under the IDEA.

IV. CAUSES OF ACTION

A. Appeal of Administrative Order Under the IDEA

4.1 The factual allegations set forth in the above paragraphs are incorporated by reference.

1 4.2 Pursuant to the IDEA and Washington State's special education laws, the
2 Defendant District denied T.J. a FAPE and committed multiple procedural violations of IDEA
3 that resulted in a denial of FAPE to T.J. during the 2022-2023, 2023-2024, and 2024-2025
4 school years.

5 4.3 The ALJ Decision included multiple factual errors. The ALJ Decision also made
6 several factual findings that were unsupported by the record.

7 4.4 The ALJ Decision committed multiple errors of law. Although the ALJ Decision
8 found the District committed procedural and substantive violations of the IDEA, ALJ
9 McDonald concluded these violations did not deny T.J. a FAPE.

10 4.5 The ALJ Decision erroneously concluded that Plaintiffs were not entitled to the
11 relief they requested, which included, but was not limited to, reimbursement of tutoring the
12 Plaintiff funded through Huntington Learning Center from May 2024 through August 2024.

13 4.6 The Plaintiff is aggrieved by the ALJ Decision and is entitled to appeal that
14 decision.

15 **B. Request for Reasonable Attorney Fees and Costs under the IDEA**

16 4.7 The factual allegations set forth in the above paragraphs are incorporated by
17 reference.

18 4.8 If Plaintiff prevails on her appeal, she is entitled to attorneys' fees and costs for
19 the underlying action that gives rise to this appeal, pursuant to 20 USC § 1415(i)(3)(B).

20 4.9 Plaintiff is entitled to reasonable attorney fees and costs related to this action.

21 **V. REQUEST FOR RELIEF**

22 WHEREFORE, Plaintiff requests that this Court:

23 5.1 Reverse the erroneous findings and conclusions in the ALJ Decision.

24 5.2 Determine that Plaintiff Parent A.A. is a prevailing party in the underlying IDEA
25 action and this appeal.
26

5.3 Enter a declaratory judgment that the Defendant District denied minor disabled student T.J. a free appropriate public education under the IDEA and state law.

5.4 Grant Plaintiff's request for reimbursement for tuition, related costs, and other services paid for by Plaintiff A.A. in pursuing her IDEA claims.

5.5 Award Plaintiff her costs and reasonable attorney's fees as a prevailing party in the IDEA due process hearing and any additional fees incurred in this action to enforce her rights to a fee award pursuant to 20 USC § 1415(i)(3)(B).

5.6 Award any further relief the Court deems appropriate.

Respectfully submitted this 22nd day of July 2025.

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